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Attorneys for Defendant  
Louisville Ladder Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CESAR U. MORENO  
CASTELLANOS, a/k/a CESAR  
MORENO, an Individual,

Plaintiff,

vs.

LOUISVILLE LADDER INC.,  
and DOES 1 to 25, Inclusive,

Defendants.

CASE No. C 08-02009 BZ

**STIPULATED MOTION FOR  
PROTECTIVE ORDER**

COMPLAINT FILED: March 21, 2008  
Trial Date: July 13, 2009

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the parties hereby file this Stipulated Motion for Protective Order to safeguard the confidentiality of certain documents and information that the parties consider to be confidential, proprietary, and a trade secret. In support of this Stipulated Motion, the parties would show the Court as follows:

1. Louisville Ladder is prepared to produce certain documents and information that are confidential, proprietary, and trade secrets, including but not

limited to design drawings, test data, and the like. These documents contain technical, confidential business information that is secret and of value to Louisville Ladder. Louisville Ladder takes measures to prevent these documents from becoming available to persons other than those selected by Louisville Ladder to have access to for limited purposes.

2. Louisville Ladder is prepared to produce the above-described confidential documents pursuant to its discovery obligations, although it is imperative that the parties first obtain some assurance that Louisville Ladder's confidential documents will be kept confidential and not used for any improper purpose.

3. Pursuant to Rule 26(c)(7) of the Federal Rules of Civil Procedure, the Court may order "that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a designated way. . . ." In accordance with this provision, the parties request the Court to enter a Protective Order in the form of the proposed order filed herewith.

WHEREFORE, the parties respectfully move the Court to enter a Protective Order pursuant to Fed. R. Civ. P. 26(c)(7).

DATED: August 28, 2008

SNELL & WILMER L.L.P.

By: Randolph T. Moore  
Randolph T. Moore  
Attorneys for Defendant

DATED: August \_\_, 2008

LAW OFFICE OF THOMAS J. GUNDLACH

By: Thomas J. Gundlach  
Thomas J. Gundlach  
Attorneys for Plaintiff

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18

19 DATED: August 28, 2008

SNELL & WILMER L.L.P.

20 By: Randolph T. Moore  
21 Randolph T. Moore  
22 Attorneys for Defendant

23 DATED: August 28, 2008

LAW OFFICE OF THOMAS J. GUNDLACH

24 By: Thomas J. Gundlach  
25 Thomas J. Gundlach  
26 Attorneys for Plaintiff  
27  
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**Cesar U. Moreno Castellanos v. Louisville Ladder, Inc.**

**USDC – Northern Division**

**Case No. C08-02009 BZ**

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 600 Anton Boulevard, Suite 1400, Costa Mesa, California 92626.

On August 28, 2008, I served, in the manner indicated below, the foregoing document described as:

**STIPULATED MOTION FOR PROTECTIVE ORDER** on the interested parties in this action:

**Thomas J. Gundlach, Esq.**  
**700 Larkspur Landing Circle,**  
**Suite 175**  
**Larkspur, CA 94939**

TEL: 415-925-9488  
FAX: 415-925-9489

☒ BY E-FILING (USDC Central): I caused such document to be sent electronically to the court; pursuant to General Order No. 08-02, electronic filing constitutes service upon the parties who have consented to electronic service.

☒ FEDERAL: I declare that I am employed in the office of a member of the bar of this Court, at whose direction the service was made.

EXECUTED on August 28, 2008, at Costa Mesa, California.

//s// Sandi Martinez  
Sandi Martinez